

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

*In the Matter of Search Warrants Executed on  
April 9, 2018*

MICHAEL D. COHEN,

Plaintiff,

- against -

UNITED STATES OF AMERICA,

Defendant.

18-MJ-3161 (KMW)

SPECIAL MASTER REPORT

BARBARA S. JONES, Special Master:

By Order of Appointment, dated April 27, 2018 [Dkt. No. 30] (the “Order”), the Court appointed the Hon. Barbara S. Jones (Ret.) as Special Master to render decisions regarding “privilege issues related to materials seized in the execution of certain search warrants executed on April 9, 2018 (the “Seized Materials”).” *See* Order at 1. This report is submitted to provide the Court with an update of the Special Master’s progress.

Review and Production Status

The parties have provided materials to the Special Master on an expedited and rolling basis. On May 4th, the Government produced electronic copies of eight boxes of hard copy documents to the Special Master. On May 9th, the Special Master concluded her review of those materials and provided designations to the Plaintiff. The Plaintiff and Intervenors will conclude providing their objections to these designations by Monday, May 14, 2018. After reviewing the objections, the Special Master will make final privilege designations for these materials.

On May 8th and 9th, the Special Master received the first productions of electronic data from the contents of certain telephones and iPads. The Plaintiff and Intervenors have provided privilege designations to the Special Master for these materials. The Special Master's review is ongoing and she will provide designations to the parties once her review is complete.

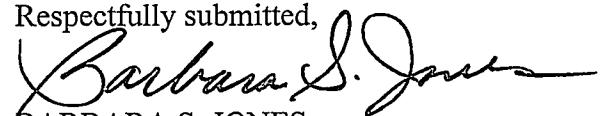
Additional electronic data from the contents of other telephones and digital devices were produced to the Special Master on May 11th. The Government expects to complete its rolling productions no later than May 25, 2018, with the possible exception of the electronic contents of one computer. The Special Master will continue to confer with the parties regarding the timeline for concluding the review and the procedure for resolving disputes as to privilege.

Compensation and Expenses

Subject to the Court's approval, the parties have agreed to an hourly rate and the Special Master intends to submit invoices for the Court's review and approval monthly.

DATED:      New York, New York  
                  May 11, 2018

Respectfully submitted,

  
BARBARA S. JONES  
Special Master